

**Design and Access Statement
Planning Statement**

Siting of 2(no.) static caravans
for holiday let purposes
Moor Farm House
Moor Lane
Stubton



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1.Introduction

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1. The Town & Country Planning (Development Management Procedure) (England) Order 2015 requires certain types of application for planning permission to be accompanied by a **Design and Access Statement**. This statement has been prepared in line with relevant national guidance. It conforms to the advice set out in national guidance, and has been prepared in accordance with best practice guidance on the preparation of such statements. Regard has also been paid in the preparation of this statement to the development plan and national planning policy guidance, and in particular the **South Kesteven Local Plan** and the **National Planning Policy Framework (2021)**.
2. The statement comprises the following main elements;-
3. A description of the **proposed development** and its location
4. The **Site Appraisal** section examines the physical context. The design solution for the site has been based upon a full and thorough understanding of the site and the surrounding area. Site appraisal forms a fundamental part of the evaluation process.
5. The **Planning Considerations** section considers the planning issues arising from the proposed development with particular regard to development plan policies.
6. The **Design Component** sets out the design principles and concepts that have been applied to the proposed development. It describes how the physical characteristics of the scheme have been informed by robust site appraisal, assessment and evaluation. The resulting design principles that emerge from that appraisal process are considered under the headings of **Use, Amount, Layout, Scale, Landscaping, and Appearance**.
7. The **Access Component** explains the approach that has been adopted in relation to accessibility. It describes how relevant **development plan policies** have been taken into account. **Consultations** undertaken are outlined. It describes how prospective users will gain **access to the development** from the existing transport network and, why points of access have been chosen. It also considers **equality of access**; how everyone can get to and move through the proposed development on equal terms regardless of age, disability, ethnicity or social grouping.
8. The **Conclusions** section, by reference to a comprehensive check-list outlines how the proposed development conforms to good design principles.

2. Proposed development

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9. This full planning application, proposes the siting of 2(no.) holiday-let units within the grounds of Moor Farm House, a large residential property with extensive grounds, located on the eastern side of Moor Lane, Stubton. The holiday-let units which comprise two identical 3-bedroomed static caravans set within a rectangular paddock area located to the south of the garden area to the property. Set within the garden area of the property is a menage. This adjoins the application site on its northern side. To the south of the site, and separated from the application property by a tall line of established conifers are farm buildings forming part of Moor Farm. The application property, Moor Farm House is in separate ownership to, and not associated with Moor Farm to the south.
10. Moor Lane runs northwards off the Stubton – Brandon road approximately 1 km to the east of Stubton village. The road leads ultimately to Gorse Lodge and the Brandon Wood shooting ground. Set alongside the property is Moor Farm as well as a number of roadside dwellings, including Moor Farm House.
11. The site is set on the eastern side of the road between Moor Farm and the garden of Moor Farm House. The site is bounded on its western and southern boundaries by close-boarded timber fences. The eastern and southern boundaries are defined by post and rail fencing. Beyond the post and rail fencing to the south is the line of tall conifers. To the east, beyond a grass margin are agricultural fields. The site is accessed from Moor Lane by means of an existing gated access, set towards the southern end of the western boundary (Moor Farm House is separately accessed further along Moor Lane). The roadside fencing, combined with the tall line of conifers and the adjoining farm buildings is such that the site has limited visibility from Moor Lane and no material visibility from other nearby roads or public vantage points.
12. The screened nature of the site, lends itself to a suitably scaled leisure usage (holiday-lets). There is a significant demand for such accommodation, particularly from nearby leisure facilities and attractions (Stubton hall, Brandon Wood Shooting Ground, PFI International, Fulbeck Airfield kart racing as well as the game shoot operating out of Moor Farm). Two static caravan units are proposed to be sited on the land, to be occupied for holiday let purposes. These are located in the north-eastern corner of the site in a set-back position from Moor Lane.
13. By their location, the proposed units will be largely unseen from public vantage points. There are no residential properties in the immediate vicinity of the site (Moor Farm House is located over 80m away), and the use will not give rise to any harmful amenity impacts. The proposed units will be screened by existing perimeter fencing and adjoining tree planting, and will have no adverse impacts upon the character and appearance of the locality.
14. The proposals in this case are fully supported by development plan and national planning policies relating to tourism and leisure development. The site is well located and offers a range of nearby visitor amenities – that contribute to the overall sustainability of the undertaking.
15. The particulars of the applications are considered in further detail within this Design and Access Statement. For clarity the key design and access considerations are summarised below;

USE: the use or uses proposed for the development and any distinct development zones within the site identified

The proposals in this case seek full planning permission for the siting of 2(no.) static caravans for holiday let purposes. The proposed holiday lets are located within the extensive grounds of Moor Farm House, a residential property set on the eastern side of Moor Lane, Stubton. Holiday let uses in rural areas are supported by paragraphs 88 and 89 of the National Planning Policy Framework (2024), and by Policies SP5 and E7 of the South Kesteven Local Plan. It is considered that the application proposals accord with the relevant provisions of these policies, and represent an appropriate and sustainable rural economic development. By their location and scale, the proposals will give rise to no harm to the character and appearance of the countryside and will give rise to no adverse amenity impacts.

AMOUNT OF DEVELOPMENT: the amount of development proposed for each use

Two (no.) three-bedroomed holiday let units are proposed. The green-coloured static caravan units are set in the north-eastern corner of the defined application site. The site is accessed from Moor lane, to the north of Moor Farm. The number of holiday-let units can be accommodated in this case without impacting upon the character of the site or the wider locale. From points outside the site, the units will be largely unseen and will have no detrimental impact upon countryside character.

LAYOUT: an indicative layout with separate development zones proposed within the site boundary where appropriate

The plans accompanying the application identify the proposed development layout. The two units are proposed to be located in the north-eastern corner of the site. The two units are set perpendicular to each other, one unit set parallel to and adjacent the northern site boundary, and one set parallel and adjacent to the eastern site boundary. A gravelled driveway leads from the existing gated access point to a point adjacent the two units, where there is adequate space for vehicle parking. The remainder of the site is laid to grass. The proposed works are modest and proportionate, with minimal interventions to the existing site. There will be no adverse impacts upon the character and appearance of the locality and there will no adverse amenity impacts arising from the development.

SCALE : an indication of the upper and lower limits for height, width, and length of each building within the site boundary

The development has no scale implications. The proposed units are appropriately scaled, each having a floor area of approximately 40.6 sq.m (measured externally) and an overall height of 3.6m. This scale and amount of accommodation can be assimilated into the site without giving rise to issues of overdevelopment. The character of the locale will be preserved. By their design and materials/ colour, the units will suitably complement their surroundings.

ACCESS : an area or areas in which the access point or points to the site will be situated

Access to the proposed units is via an existing gated entrance from Moor Lane. Moor Lane is lightly trafficked and the access point enjoys good visibility in both directions. Suitable and adequate provision is made for vehicle parking within the site.

3.Site appraisal

Siting of 2(no.) static caravans for holiday let purposes, Moor Farm House, Moor Lane, Stubton

- 16. The National Planning Policy Framework (NPPF) emphasises the importance of good design in the planning process. Good design, the guidance states is a key aspect of sustainable development, is indivisible from good planning and should contribute to making places better for people. Inclusive design, the guidance emphasises, goes beyond the mere architectural and visual appearance of buildings; it should also ensure connectivity between people and places and integration of new development into its natural or built surrounds.
- 17. High quality and inclusive design should create well-mixed and integrated developments which avoid segregation. Good design should ensure places function well and that developments add to the overall character and quality of the area, not just for the short term, but for the lifetime of the development. Good design will emerge from a full understanding of the site and its surroundings. This section describes the site and the surrounding area, and then appraises the factors that contribute to the character and appearance of the area, and the key factors that should influence design on the site.

The application site and the surrounding area

- 18. The application property in this case comprises Moor Farm House, located on the eastern side of Moor Lane, Stubton.



Plan (not to scale), identifying the location of the application site

19. Moor Lane is located approximately 1km to the west of Stubton village, running northwards off the Stubton – Brandon road. The road, which runs for approximately 500m as an adopted road, before becoming a private road, ultimately leads to Gorse Lodge and the Brandon Wood Shooting Ground. Set alongside the road is sporadic development, including a farmyard area (Moor Farm) and several residential properties.
20. Moor Farm comprises a farmyard area, comprising several large, modern agricultural buildings set alongside Moor Lane on its eastern side. To the south of the yard are two cottages. Set opposite the Moor Farm yard is Stubton Lodge, a large residential property set in extensive grounds which contain a game bird rearing enterprise.
21. To the north of Moor Farm and unconnected to the farm operation is Moor Farm House. This comprises a relatively modern property set within a large elongated, north-south aligned plot, extending for several hundred metres along the eastern side of the lane. The dwelling is set centrally within the plot, with paddock areas to the north and garden and paddocks to the south. There are a number of stable buildings set alongside the dwelling, and the rear garden area to the south of the property includes a large menage area (The stables and menage are for personal use only). To the north-west of Moor Farm House, is a semi-detached dwelling pair. Gorse Lodge is 800m to the north-east, at the end of the lane these are rented farm properties).



Moor Lane.

The Moor Farm House property is highlighted by the yellow pecked line



The application site and the remainder of the Moor Farm House property

22. Moor Farm House occupies an approximate 1.0ha elongated rectangular plot, extending along the eastern side of Moor Lane. The dwelling is set roughly midway along the frontage, and is aligned west east with its principal elevation facing northwards. To the north of the dwelling are stables beyond which are several paddocks. To the south of the dwelling is a large rear garden area, beyond which is a small paddock area. Set within the garden area, alongside Moor Lane is a large menage area. A close boarded fence runs alongside the Moor Lane boundary.
23. The application site in this case comprises the paddock area asset to the south of the main rear garden area to the dwelling. This paddock has a rectangular form, and has a (north-south) width of 29m and a (west-east) depth of 53m. To the west the paddock is bounded by Moor Lane, to the north by the garden and menage and to the south by Moor Farm. Set between the paddock and the Moor Farm yard and buildings is a tall conifer tree line, the trees exceeding 10m in height. To the east, beyond a maintained filed margin are open fields. The southern and eastern boundaries of the paddock are defined by post and rail fences, whilst the western and northern boundaries are defined by close boarded timber fencing. The paddock is accessible through gates from the garden and menage to the north. It also benefits from a gated access directly onto Moor Lane.
24. The application site is considered to represent an ideal location for a suitably scaled leisure / holiday-let development. Such development – for a small number of holiday-let units – could be accommodated within the site and would have no material visibility from points outside the site, being set back from principal thoroughfares and screened by perimeter fencing and vegetation. There is adequate space within the grounds of the site to accommodate the parking needs of such a use. The existing entrance from Moor Lane gives ready access to the site

without impacting upon existing properties. The screened nature of the site is such that there is some latitude in terms of the design treatment of any units. This could comprise, for example, either static caravans, or suitably designed log-cabin type structures.

Site appraisal conclusions

25. Based upon an appraisal of the site and the locality, it is considered that the following are the key conclusions relating to the site that should inform the design response;

- ❖ The application site is located on a lightly trafficked side road. The particular characteristics of the site are considered to offer the potential for a suitably scaled tourism / leisure development. The site benefits from screening to its main boundaries and as a result a small development of holiday let units would have no material visibility from the surrounding area.
- ❖ Any development (for example, static caravans or log cabins) should appropriately respond to their particular context. The numbers of units should be limited, and sited where their impact can be minimised. They should enjoy and appropriate separation from each other and from the principal dwelling.
- ❖ Appropriate provision should be made for vehicle parking,

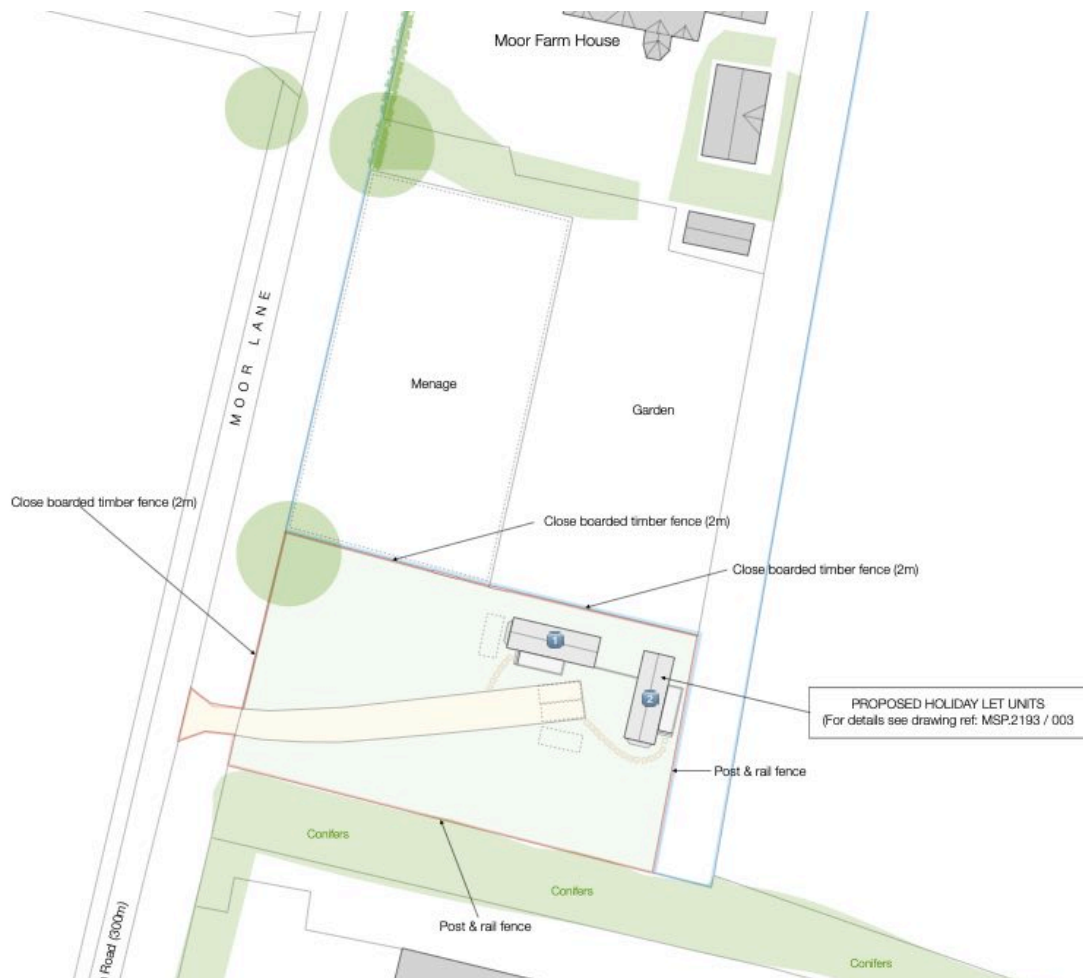
26. The design response in this case has paid full regard to these considerations.

The proposed development

27. The application in this case, which is a full planning application, proposes the change of use of the site to holiday let / leisure use, to include the siting of 2(no.) 3-bedroom static caravans. The units, the siting of which is illustrated on the plan below, would each have a floor area of approximately 40 sq.m and a height of approximately 3.6m. The units would be set in the north-east corner of the site, away from Moor Lane. They have a conventional static caravan styling. With a projecting bay at one end. The units are finished in profiled green cladding with a pitched roof of grey/green interlocking tiles.

28. Access to the units will be via the access point from Moor Lane. A gravelled driveway cuts across the site from the access to the caravans. This affords adequate parking for the two units, and the grassed areas adjoining the units are also available for parking.

29. Details of the proposed units, and their siting are illustrated below.



Block plan extract showing the location of the three proposed lodges



The two proposed units viewed from the Moor Lane entrance



View westwards from the caravans towards Moor Lane



Example unit (the two units are of the same style / design)

4.Planning Considerations

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Overview

30. This section sets out the planning policy considerations relevant to the proposed development. Whilst not required as part of a Design and Access Statement, it is considered that a full understanding and appraisal of the relevant policy context will positively inform the design response.

National planning policy: the principle of development

31. The proposed holiday-let development is supported by the provisions of Paragraph 88 of the National Planning Policy Framework (2024) relating to the development of a **prosperous rural economy**.

32. Paragraph 84 states that planning policies and decisions should enable

‘the sustainable growth and expansion of all types of business and enterprise in rural areas, both through the conversion of existing buildings and well-designed new buildings.’

33. Furthermore, in relation to tourism and leisure developments, the guidance continues by stating that support should be given to:-

‘sustainable rural tourism and leisure developments which respect the character of the countryside’.

34. This latter bullet point is an abridged version of that which appeared in Paragraph 28 of the 2012 NPPF. Para.28 had referenced that planning policies and decisions should;

‘support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres.’

35. The revised criterion in the 2018, 2019 and 2021 versions of the NPPF place less emphasis on the need to locate facilities in rural service centre locations (references to locations where needs are not met within existing rural service centres is omitted). This is further emphasised by paragraph 88 of the guidance. This is a new paragraph originally introduced into the 2018/2019 Frameworks and maintained in the 2024 version, and one that is especially relevant in this instance;

85.Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). Cont/...

The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

36. This paragraph is a significant departure from previous guidance and, whilst development plan policy broadly aligns with its provisions, the guidance must assume some precedence over policies either adopted prior to the publication of Framework or based upon previous NPPF guidance (the Council's new Local Plan, adopted in January 2020 was examined against the 2012 Framework, not the current 2019 Framework, which includes the above additional paragraph).
37. Notably, the guidance recognises that tourism and leisure developments may not necessarily be able to be located within or adjoining existing settlements. In such circumstances the policy simply requires that developments are sensitive to their surroundings, do not impact upon local roads and exploit opportunities to make a location more sustainable. These are considered to be the most relevant policy tests in this case
38. Importantly, the guidance re-focuses sustainability consideration away from the specific location of the site relative to service centres, and looks at sustainability considerations more broadly. We examine these matters in more detail below.
39. In our view, the proposed development must be seen to sit full-square with this aspect of national policy. Two of the four Paragraph 88 strands are satisfied (paragraphs (a) & (c)). Only one need be satisfied.

PPS7 and the Rural Tourism Good Practice Guide

40. Tourism issues, pre-NPPF, were considered in some detail, both within *PPS7: Sustainable Development in Rural Areas*, and within a 2006 document *Good Practice Guide on Rural Tourism*. Whilst these documents have now been replaced by the NPPF, both the NPPF and the accompanying NPPG are lighter on detail in relation to rural tourism issues. The provisions of the earlier guidance in our view continue to have some general applicability insofar as they outline relevant considerations relating to rural tourism development. There is nothing in the earlier guidance that is inconsistent with the provisions of Paragraphs 88 and 89 of the NPPF.
41. Paragraph 34 of PPS7 recognised that tourism and leisure activities are vital to many rural economies, and this should be recognised within development plans. Recreation and tourism were seen by the PPS as not only providing a significant source of employment, but also supporting the rural economy more generally. Planning policies, the guidance stated, should support sustainable rural tourism that is not harmful to the countryside. Such general principles do not cut across the NPPF and must be seen as equally relevant considerations today.
42. Section 5 of the Good Practice Guide identified and considered the key considerations for **tourism development**; Section 5.1 identified the three principal considerations to be **location**, **design** and **impact**. Again, whilst now withdrawn, these general considerations remain relevant to the consideration of tourism projects.

Location

43. Tourism developments need to be located where they are accessible to visitors, and for many, but not all, accessible by means other than by car. They should not impact upon sensitive environments. Reconciling accessibility with leisure and tourism uses, which often will be located in attractive and more-remote countryside environments, can sometimes be

challenging. The Good Practice Guide recognised that in the case of small-scale schemes traffic generation will be typically low and additional traffic movements are unlikely to represent a reason for refusal of planning permission. In this case, the site has good accessibility credentials. It enjoys good, ready access to the primary road network and to nearby villages (such as Caythorpe, Claypole and Long Bennington), with together offer a broad range of shops and services. Equally importantly, the site offers good, proximate accessibility to nearby leisure facilities which are reliant upon the local availability of visitor accommodation. Local facilities include;

- ❖ Brandon Wood Shooting Ground
- ❖ Stubton Hall
- ❖ PFI Karting Circuit
- ❖ Fulbeck Airfield Karting
- ❖ J & J Alpaca Centre
- ❖ Newark Showground
- ❖ Belvoir Castle functions
- ❖ Arena UK

44. Based upon the specific site characteristics it is evident that the development can be accommodated in this location without adverse or detrimental effects.
45. The provisions of paragraph 88 of the NPPF suggest that in locations beyond settlements and not accessible by public transport, *'it will be important to ensure that development is **sensitive to its surroundings**, does not have an **unacceptable impact on local roads** and **exploits any opportunities to make a location more sustainable** (for example by improving the scope for access on foot, by cycling or by public transport).*
46. Whilst we would argue that the site in this case is appropriately located, with easy access to services, the following paragraphs illustrate that the development is nevertheless also **sensitive to its surroundings**. It is a site that is very well screened from public vantage points, and will have no adverse or detrimental impacts upon wider countryside character. The existing site is presently enclosed by fencing, and is abutted by a farmyard and a residential garden. Characteristically the land is very different in character to the adjoining countryside that is in arable usage.
47. In relation to the **impact upon the local road network**, it is considered that the access serving the site is of an acceptable standard, with a good quality junction onto Brandon Road that enjoys good visibility in each direction. The scale of development proposed in this case will not have a detrimental or harmful impact on the wider road network.
48. In terms of **opportunities to make the location more sustainable** the following measures will ensure that the development's sustainability is optimised;
- ❖ The provision of good quality self-catering accommodation that reduces the need to travel;
 - ❖ The provision of visitor information local services and attractions.
 - ❖ The provision of welcome packs for visitors with essential supplies – eg. milk, tea, bread etc.
 - ❖ Details of local walking, cycling and bus routes
 - ❖ Details of accessible, local attractions

Design

49. The Good Practice Guide further identified that tourism developments should be attractive to users. They need to work well in functional terms and need to use natural resources in an efficient manner.
50. The development in this case has been specifically designed to meet user requirements. The site makes best use of an existing underused resource and the development will have no material or harmful visibility from public vantage points. The development can be accommodated in this case with minimal physical interventions. The proposals are sensitive to the character of the site.
51. There is ample evidence of a demand for this type of facility. This type of facility is under represented in the local area.

Impact

52. Developments need to reflect their environs and complement them rather than detract from them. They should be designed to have positive impacts upon the landscape, setting and ecology.
53. The development can be accommodated in this location without adverse impacts. The site has the capacity to accommodate the limited development now proposed without adverse or detrimental impact. Additional landscaping and tree planting can be provided to offset any losses.

National planning policy: Summary points

- ❖ NPPF Para.88 states that within rural areas, planning policies and decisions should enable;
 - The sustainable growth and expansion of all types of business, both through conversions and well-designed new buildings
 - sustainable rural tourism projects that respect the character of the countrysideThe proposed development would meet these objectives.
- ❖ Paragraph 89 recognises that rural businesses may not be capable of being located within or adjoining settlements. Where such a location is not available / achievable, the objectives should be to ensure the development;
 - is sensitive to its surroundings
 - does not impact on local roads
 - optimises opportunities to enhance sustainabilityThe proposed development would meet these objectives. The site is close to an existing settlement with a wide range of services.
- ❖ The Good Practice Guide on Rural Tourism, which accompanied PPS7, whilst withdrawn, set out clear guidance on the location and design of new tourism facilities. The general guidance remains valid and relevant. The design and location of this development is appropriate, and accords with the best practice principles outlined in that guidance.

54. The South Kesteven Local Plan was adopted in January 2020. As highlighted above, the Local Plan was examined against the NPPF (2012) and not the current NPPF (2024). We have noted above that the 2024 version includes an additional paragraph in respect of rural business development (Para.88), not present in the 2012 version.
55. **Policies SP2-SP5 of the Local Plan** set out a broad hierarchical settlement strategy. The broad locational policy is set out in Policy SP2, with developments within and on the edge of settlements set out in Policies SP3 and SP4. Development in countryside locations are set out within **Policy SP5**. As a countryside location these proposals are supported by the provisions of **Policy SP5**, which restricts most development, but makes exceptions for certain categories of development including rural diversification projects (including tourism-related development).
56. **Policy E7** relates to the **Rural Economy**. In essence, this is the same policy as former Policy SAP H4 of the Site Allocations and Policies DPD. The policy supports (inter alia) rural enterprise proposals and tourism development in rural areas. The policy identifies a range of criteria that development must satisfy. We consider these below.

POLICY E7 Rural Economy: Business Development in the Countryside (including Rural diversification Schemes) Proposals must demonstrate that they meet all of the following criteria:		
No	Criteria	Comment
a	be of a scale appropriate to the rural location.	<i>The proposed development in this case is suitably scaled having regard to the location of the site, its context, and the nature of the proposed development. By its scale the development will have no adverse impact upon the character of the locale or residential amenity. (The nearest dwellings, other than the host property are over 100m from the site of the proposed units. The host dwelling is 80m away). The new units will not dominate or overwhelm the site or the local area. Indeed, from points outside the site they will be largely unseen.</i>
b	be for a use(s) which is (are) appropriate or necessary in a rural location.	<i>The development represents an appropriate site use. The site location and characteristics lend themselves to this particular use. Certainly, when read in conjunction with the NPP(2021) Paras.88 and 89 this may be seen to comprise an appropriate rural development.</i>
b (cont)	provide local employment opportunities which make a positive contribution to supporting the rural economy.	<i>The development proposed will provide local employment opportunities and will support other existing businesses in the locality through increased visitor spend.</i>
c	the use / development respects the character and appearance of the local landscape, having particular regard to the Landscape Character Assessments and	<i>The appearance of the locality will not be materially impacted or harmed by the proposed development. The development will have no material visibility from public vantage points. The character of the locale will not be changed or harmed by the development.</i>

	.	
C (cont)	will not negatively impact on existing neighbouring uses through noise, traffic, light and pollution impacts, and	<i>The development will give rise to no adverse amenity impacts. The development will not generate excessive levels of traffic, and will not result in any adverse pollution impacts. There are no residential properties in the immediate vicinity of the site that would be impacted.</i>
d	avoid harm to areas, features or species which are protected because they are important for wildlife, biodiversity, natural, cultural or historic assets, including their wider settings.	<i>The development will have no ecological impacts.</i>
	Schemes will also be required to ensure that the development meets the requirements of national and local planning policies which control the form, scale, design and impact of new development.	<i>No adverse impacts (scale, design or otherwise) arise from the proposed development. The proposed units complement their surroundings and will have no adverse visual impact. The proposed units by their design, siting and materials will not be obtrusive or harmful, to the character of the locality.</i>
	Any new building or extension to an existing building will only be permitted where it is clearly demonstrated that it is an essential element of the viability of the business proposal. The scale, design and construction of any new building or extension must be appropriate to its rural setting and fully justified by the business proposal.	<i>The proposed units are considered appropriate in their context. There is, based upon the evidence of previous similar applications, an unmet need for this form and type of tourist accommodation.</i>
	Proposals which generate high levels of visitor traffic or increased public use, such as large - scale sport, leisure or tourist facilities will only be permitted on the edge of the towns and Local Service Centres, or where they can be easily accessed by public transport, foot and cycle.	<i>The development will not generate high levels of vehicular traffic. The proposals include a package of measures to enhance the overall sustainability of the enterprise in line with the provisions of Paragraph 88 of the NPPF.</i>

57. The proposals in this case will demonstrably meet all relevant policy requirements.

58. **Policy E9: Visitor Economy:** This is a new and specific policy relating to the visitor economy. The policy offers a broad support for developments that will support the local visitor economy. The pre-ambule to the policy, at Paragraph 2.84 of the Local Plan states;

'The visitor economy is an important part of South Kesteven's local economy. The District attracts over 2.2 million visitors a year, generating over £156 million and supporting 2,500 jobs. In addition to the architectural and historical beauty of the District's villages and countryside, other major attractions within the District are Belton House, Woolsthorpe Manor, the Georgian heritage of Stamford, Grimsthorpe Manor, Easton walled garden and St Wulfram's Church in Grantham; the rural parts of the District provide attractions through walking and cycling

routes, canal and waterways, aviation history and other varied attractions. The importance of this sector is recognised by the GLLEP Strategic Economic Plan. Policy E9 seeks to encourage the sustainable growth in the District's visitor economy, which in turn will support growth in the local economy. The importance of the Grantham Canal to the visitor economy is also recognised and policy EN7 seeks to safeguard this important local asset.'

59. This paragraph is significant insofar as it highlights the importance of tourism to the local economy, both in terms of wealth generation and employment. As well as highlighting important attractions such as Belton House, Woolsthorpe Manor, Easton Walled Gardens, Belvoir Castle and Burghley House - all of which are readily accessible from the application site – the paragraph also highlights the inherent attractiveness of the countryside and its appeal to visitors in terms of access to the countryside for walking and cycling. We have highlighted other local leisure facilities that generate a demand for local tourist accommodation.
60. The paragraph also highlights that the Visitor Economy is one of the Sector priorities set out within the Greater Lincolnshire LEP Strategic Economic Plan for 2014-2030¹. South Kesteven District Council is a key-partner within the LEP. Within the plan, a primary objective is to double the real value of tourism to the economy by 2020. This will be achieved in part through measures to

'enhance the quality of the visitor experience through supporting the development of the visitor accommodation / hospitality sectors'

61. The policy itself states that proposals for the development of the visitor economy will be supported where for identified criteria are met.

LOCAL PLAN: POLICY E9: VISITOR ECONOMY		
Proposals for development of the local visitor economy will be supported where these:		
No	Criteria	Comment
a	allow provision for visitors which is appropriate in use and character to South Kesteven's settlements and maintains the quality of the countryside and the natural environment;	<i>The proposed development in this case is appropriate to its location and appropriate in scale and design. It will not materially detract from the character and appearance of the countryside.</i>
b	enhance existing tourist and visitor facilities; aid the retention and/or enhancement of existing overnight accommodation and the provision of new overnight accommodation;	<i>Comprising the provision of new overnight accommodation, the development is fully supported by this policy strand. The development will provide high quality accommodation of a type not presently existing in the local area.</i>
c	allow new tourism provision and initiatives where these would also benefit local communities and support the local economy; or	<i>The development will offer benefits to the local economy in terms of increased local visitor spend as well as local employment opportunities.</i>
d	allow new tourism development of an appropriate scale and use which utilises existing historic buildings in the countryside whilst respecting their character	<i>Not applicable. The proposals do not involve the re-use of existing historic buildings.</i>

¹ Greater Lincolnshire LEP: Strategic Economic Plan: 2014-2030:

[https://www.greaterlincolnshirelep.co.uk/assets/documents/Strategic Economic Plan 2016 Refresh.pdf](https://www.greaterlincolnshirelep.co.uk/assets/documents/Strategic_Economic_Plan_2016_Refresh.pdf)

In all cases proposals should be of a scale appropriate to the setting of the area and a sequential test should be applied where appropriate.	<i>The development is appropriately scaled, the amount of development will not dominate the site, the wider locale .</i>
Proposals which generate high levels of visitor traffic or increased public use of tourist facilities should only be permitted within or on the edge of the towns and Larger Villages, or where they can be easily accessed by public transport, foot and cycle.	<i>The development will not generate high levels of vehicular traffic. Embodied within the proposals are measures to make the development as sustainable as possible, that will reduce the overall need for visitors to travel.</i>
To ensure that tourism-related development does not result in the creation of permanent living accommodation, conditions may be imposed which restrict the use and/or period of occupation.	<i>The development will not comprise permanent residential accommodation. Conditions may reasonably be imposed to safeguard against this.</i>

62. **Policy DE1** of the Local Plan relates to **Promoting Good Quality Design**. The policy outlines a number of design considerations to which all development proposals should conform, along with a number of policies to which major development proposals should also conform. Criterion (a)-(f) are relevant in this instance.

POLICY DE1: PROMOTING GOOD QUALITY DESIGN		
To ensure high quality design is achieved throughout the District, all development proposals will be expected to:		
No	Criteria	Comment
a	<i>Make a positive contribution to the local distinctiveness, vernacular and character of the area. Proposals should reinforce local identity and not have an adverse impact on the streetscene, settlement pattern or the landscape / townscape character of the surrounding area. Proposals should be of an appropriate scale, density, massing, height and material, given the context of the area;</i>	<p>The development proposals in this case are considered appropriate to their context.</p> <p>Given the location of the units, there will be no adverse impacts upon the street scene.</p> <p>The development is appropriately scaled and will not dominate the locality. The development will be suitably absorbed into the wider landscape. The design of the development is considered to be appropriate having regard to the nature and character of its surroundings.</p>
b	<i>Ensure there is no adverse impact on the amenity of neighbouring users in terms of noise, light pollution, loss of privacy and loss of light and have regard to features that minimise crime and the fear of crime; and</i>	The development enjoys appropriate separation from the nearest dwellings and there will be no adverse amenity impacts in this instance. No issues of overlooking or overbearing impact will arise.
c	<i>Provide sufficient private amenity space, suitable to the type and amount of development proposed;</i>	The proposed holiday let accommodation will enjoy an appropriate level of amenity space, within the site.
Development proposals should seek to:		
d	<i>Retain and incorporate important on site features, such as trees and hedgerows and incorporate, where possible, nature conservation and biodiversity enhancement into the development;</i>	Existing site landscaping will not be materially impacted in this case. The existing landscaping will ensure appropriate screening of the proposed units. Site landscaping can be undertaken, although considered unnecessary in this instance.

e	<i>Provide well designed hard and soft landscaping; and</i>	Appropriate additional landscaping can be carried out as part of the development if considered necessary.
f	<i>Effectively incorporate on site infrastructure, such as flood mitigation systems or green infrastructure, as appropriate.</i>	The development will incorporate appropriate site infrastructure. The site is not located within a flood risk area.

63. The development will also accord with the **Principles of Sustainable Development in South Kesteven**, set out within **Policy SD1**.

POLICY SD1: THE PRINCIPLES OF SUSTAINABLE DEVELOPMENT IN SOUTH KESTEVEN		
Development proposals in South Kesteven will be expected to minimise the impact on climate change and contribute towards creating a strong, stable and more diverse economy.		
Development proposals shall consider how they can proactively minimise:		
No	Criteria	Comment
a	<i>the effects of climate change and include measures to take account of future changes in the climate;</i>	The development, incorporates appropriate building technologies to minimise energy consumption and maximise resilience to climate change.
b	<i>the need to travel, and wherever possible be located where services and facilities can be accessed more easily through walking, cycling or public transport;</i>	The proposals incorporate a package of measures designed to minimise the need for visitors to travel. These are considered elsewhere within the report.
c	<i>the use of resources, and meet high environmental standards in terms of design and construction with particular regard to energy and water efficiency; and</i>	The units, in its construction, incorporate appropriate building technologies to minimise energy consumption.
d	<i>the production of waste both during construction and occupation</i>	As far as practicable, waste will be managed and appropriately sorted for recycling during construction. Waste during occupation will be similarly managed to minimise landfill wastes.

Development proposals shall consider how they can proactively avoid:		
e	<i>developing land at risk of flooding or where development would exacerbate the risk of flooding elsewhere.</i>	The site is not located within a flood risk area.
f	<i>The pollution of air, land, water noise and light</i>	The development will not give rise to pollution of air, land or water. There will no adverse noise or light impacts arising from the use.

Development proposals shall consider how they can proactively encourage, as appropriate:		
g	<i>the use of previously developed land, conversions or the redevelopment of vacant or unutilised land or buildings within settlements; and</i>	The development comprises a sustainable tourism development. On-site amenities will ensure that the need to travel is minimised.
h	<i>the use of sustainable construction materials</i>	As far as practicable, sustainable construction materials will be utilised in the building works.

Development proposals shall consider how they can proactively support:		
i	<i>strong, vibrant and healthy communities, by providing a supply of housing which meets the needs of present and future generations</i>	The development will contribute to community vitality. The development will help to support local services. (The development does not however involve the provision of housing).

Development proposals shall consider how they can proactively enhance the District's:		
j	<i>character</i>	The development will complement and preserve the character of the locality.
k	<i>Natural environment</i>	The site enjoys extensive existing landscaping. Tree removal will be minimised. New tree planting will offset any losses.
l	<i>Cultural and heritage assets</i>	Countryside character will be preserved.
m	<i>Services and infrastructure, as needed to support development and growth proposals</i>	The development can be suitably serviced and there will be no negative infrastructure impacts.

64. The proposals demonstrably comply with development plan policies.

Development plan policy: Summary points

- ❖ The South Kesteven Local Plan emphasises the importance of tourism to the local economy.
- ❖ Policies for the visitor economy are derived from the UK Tourism Strategy and the Greater Lincolnshire LEP Strategic Economic Plan.
- ❖ Policy SP5 supports rural diversification projects in countryside locations
- ❖ Policy E7, which essentially mirrors Policy SAP H4 of the former Site Allocations and Policies DPD supports rural diversification projects and tourist accommodation.
- ❖ Policy E9 specifically supports the development of the local visitor economy, including the provision of new visitor accommodation.
- ❖ The proposed development is supported by and does not conflict with these policies.
- ❖ The proposals similarly satisfy the provisions of Policy DE1 and SD1
- ❖ Whilst the development is policy compliant, it is noteworthy that the Local Plan has been examined against the NPPF (2012). It has not therefore examined against more recent versions of the NPPF and in particular the provisions of paragraphs 88 and 89 of the 2021 Framework. It does not appear that Policies E7 and E9 fully embrace the provisions of Para.88 of the NPPF (2021). In this respect the more up to date NPPF provisions should prevail.

Sustainable tourism

65. As discussed earlier within this submission, policy provisions place a particular emphasis upon development comprising ‘sustainable rural tourism and leisure developments’. There is little offered with policies or guidance as to what ‘sustainable rural tourism’ actually comprises, although it is clear that is conceptually quite distinct from to more general concepts of sustainability, as for example in relation to the location of new residential development. Paragraph 88 of the NPPF recognises for example that sites (including visitor facilities) may have to be found adjacent to or beyond existing settlements, in locations that are not well served by public transport. In these circumstances, the guidance states, it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact upon local roads and exploits any opportunities to make a location more sustainable. It encourages the use of previously developed land, and ‘sites that are physically well related to existing settlements’.

66. It might reasonably be inferred that at development that satisfies these considerations comprises a sustainable tourism development. We consider each of these paragraph 85 issues in turn;

Sustainable rural tourism – NPPF (2024) Paragraph 88 considerations

- ❖ Sensitivity to surroundings
- ❖ Impact upon local roads
- ❖ Opportunities to make a location more sustainable
- ❖ Use of previously developed land
- ❖ Relationship to existing settlements

Sensitivity to surroundings

67. The application site, occupies a well-screened site. The proposals in this case have been carefully and thoughtfully evolved to minimise any potential impacts. By the limited scale and height of the units, their limited number, their materials and the extensive boundary treatments, the development will have no adverse or detrimental impact upon the character of the wider locality. The works are sensitive and appropriate to their surroundings.

Impact upon local roads

68. There will no adverse impact upon local roads. The development will utilise Moor Lane for vehicular access. This has adequate capacity to accommodate the modest additional vehicular flows arising.

69. The nature and scale of the proposed development is such that it will not generate significant levels of traffic. The sustainability measures, which we further outline below, are intended to reduce the need to travel from the site by car. Whilst car travel will not be eliminated, the measures will ensure, in line with guidance, that journeys are minimised. In the context of the Framework guidance, this is not a development that will generate significant or excessive levels of traffic that would have adverse impacts upon local roads (or local residential amenity). In relation to paragraph 116 of the NPPF there will not be '*unacceptable impact in highway safety*' and residential cumulative impacts will not be '*severe*'.

Opportunities to make the location more sustainable

70. It is generally recognised that where a particular site is in a less accessible location, accessibility considerations may to a great extent off-set by the provision of on-site facilities / attractions, which typically would serve to reduce the necessity to travel. Whilst in the present case the site location cannot reasonably be classed as remote the applicant is proposing a package of measures that seek to minimise car dependency. These measures include;

- Nearby attractions that reduce the need to travel; this includes the use of local footpath, and the use of adjoining grounds for sport, recreation and dog-exercising.
- The provision of visitor information about local facilities (including village and nearby town facilities and attractions) and walking routes (as part of a resources pack provided within the units).
- The provision of welcome packs for visitors with essential supplies – eg. milk, tea, bread, toiletries etc.
- Details of local bus routes

71. Collectively these measures illustrate a tourism development that optimises sustainability. The proposals in this respect fully accord with relevant national and local planning policy.

Benefits

72. The importance of tourism to the local economy is highlighted in the Greater Lincolnshire LEP Strategic Economic Plan, which underpins emerging Local Plan tourism policies. Those benefits include;

- ❖ Increased visitor spend in the local area; shops, public houses, attractions etc
- ❖ Increased use of local services;
- ❖ Enhancements to the local environment including increased landscaping and enhancements to biodiversity.
- ❖ Local employment – servicing and maintaining the facility

Development Plan Conclusions

73. The proposed development is considered to satisfy all relevant policy considerations. The Design and Access Statement has identified a form of development that is appropriate in its context, and which will give rise to no material harm that would justify the withholding of consent.

5.Design Component

Siting of 2(no.) static caravans for holiday let purposes, Moor Farm House, Moor Lane, Stubton

74. This section considers the design issues relating to the proposed residential development arising from the site appraisal of the earlier section. The National Planning Policy Framework (2018) Paragraph 127, outlines matters to consider when assessing design quality. These include a consideration of whether the development;-

A	<p>Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development</p> <ul style="list-style-type: none"> • The site is reasonably proximate to services and community facilities (notably in nearby villages such as Claypole, Caythorpe and Long Bennington). • The proposals entail limited new development, which will be well screened from public areas and will have no adverse impacts upon the wider locale. • The application proposes an efficient use of space that is safe, accessible and user-friendly. • The development will incorporate appropriate measures to minimise the energy consumption, and ensure its resilience to climate change.
B	<p>Are visually attractive as a result of good architecture and appropriate landscaping</p> <ul style="list-style-type: none"> • The design of the units responds to their context and will have minimal visibility
C	<p>Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)</p> <ul style="list-style-type: none"> • The proposed units by their scale, siting and materials are sensitive to the wider landscape. • By its scale and location, the development will be compatible with its surroundings. • Landscape setting will not be impacted by the proposed development.
D	<p>Establish or maintain a strong sense of place, using the arrangement of streets, spaces and building types and materials to create attractive, welcoming and distinctive places to live, work and visit</p> <ul style="list-style-type: none"> • The development has been designed to complement the character and appearance of the locality. It will preserve the character of the locality and sense of place.
E	<p>Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks</p> <ul style="list-style-type: none"> • The site relates satisfactorily with adjoining development, and will complement the existing built form. • The development is compatible with surrounding land uses. • The site will help to support local services. Services and facilities are a short distance from the site.
F	<p>Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.</p> <ul style="list-style-type: none"> •The development will be safe and accessible. The site is proximate to services and facilities •The development will offer a high standard of amenity •The development will incorporate appropriate measures to minimise crime and the fear of crime

75. Having considered compliance with these NPPF design objectives, this statement now considers the following issues required to be included in Design and Access Statements.

Use

76. The proposals in this case seek full planning permission for the siting of 2(no.) static caravans for holiday let purposes. The proposed holiday lets are located within the extensive grounds of Moor Farm House, a residential property set on the eastern side of Moor Lane, Stubton. Holiday let uses in rural areas are supported by paragraphs 88 and 89 of the National Planning Policy Framework (2024), and by Policies SP5 and E7 of the South Kesteven Local Plan. It is considered that the application proposals accord with the relevant provisions of these policies, and represent an appropriate and sustainable rural economic development. By their location and scale, the proposals will give rise to no harm to the character and appearance of the countryside and will give rise to no adverse amenity impacts.

Amount

77. Two (no.) three-bedroomed holiday let units are proposed. The green-coloured static caravan units are set in the north-eastern corner of the defined application site. The site is accessed from Moor lane, to the north of Moor Farm. The number of holiday-let units can be accommodated in this case without impacting upon the character of the site or the wider locale. From points outside the site, the units will be largely unseen and will have no detrimental impact upon countryside character.

Layout

78. The plans accompanying the application identify the proposed development layout. The two units are proposed to be located in the north-eastern corner of the site. The two units are set perpendicular to each other, one unit set parallel to and adjacent the northern site boundary, and one set parallel and adjacent to the eastern site boundary. A gravelled driveway leads from the existing gated access point to a point adjacent the two units, where there is adequate space for vehicle parking. The remainder of the site is laid to grass. The proposed works are modest and proportionate, with minimal interventions to the existing site. There will be no adverse impacts upon the character and appearance of the locality and there will no adverse amenity impacts arising from the development.

Scale

79. The development has no scale implications. The proposed units are appropriately scaled, each having a floor area of approximately 40.6 sq.m (measured externally) and an overall height of 3.6m. This scale and amount of accommodation can be assimilated into the site without giving rise to issues of overdevelopment. The character of the locale will be preserved. By their design and materials/ colour, the units will suitably complement their surroundings.

Landscaping

80. Soft landscaping is an important feature of the wider area. The site is well screened by existing vegetation to the southern boundary. Existing tree and shrub planting will be largely retained.
81. It is considered that landscaping matters are capable of being dealt with by means of appropriate conditions.

Appearance

82. The proposed units, by their scale, design and appearance are considered to represent an appropriate form of development in this location and one that will not impact upon the character and appearance of the wider area.

6. Access Component

Siting of 2(no.) static caravans for holiday let purposes, Moor Farm House, Moor Lane, Stubton

Is the development accessible and inclusive?

83. The proposed development does not include any physical or social barriers to accessibility. The site is generally level and accesses directly to pedestrian and vehicular networks. It is well located relative to facilities in nearby villages. The generally level terrain and ease of access to facilities makes the development equally accessible to all, including those with physical impairments. The proposal appears to comply with relevant development plan policies with regard to accessibility.
84. Access to buildings is dealt with under the Building Regulations, and is not specifically covered in this statement. It is not considered that there are any exceptional access issues arising in this case.

How will access be achieved?

85. The site enjoys direct vehicular access from Moor Farm Lane, from where there is ready access to the primary road network.
86. Access to the proposed units is via an existing gated entrance from Moor Lane. Moor Lane is lightly trafficked and the access point enjoys good visibility in both directions. Suitable and adequate provision is made for vehicle parking within the site.

7. Conclusions

Siting of 2(no.) static caravans for holiday let purposes, Moor Farm House, Moor Lane, Stubton

87. The appraisal process has identified a clear and justified design and access solution for the site. This has been based upon an appraisal of the site and the surrounding area. It has drawn upon the physical context of the site and the surrounding area.
88. The proposals represent an appropriate tourism development in an appropriate, sustainable location. The proposals will provide high quality holiday let units for which there is a clear, identified demand.
89. We have demonstrated that the proposed development will accord with relevant development plan and national planning policies, and give rise to no demonstrable harm that would justify the withholding of consent.

M Sibthorp
April 2026